IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

EUGENE SCALIA, SECRETARY OF LABOR,)
UNITED STATES DEPARTMENT OF LABOR,)
Plaintiff,))
v.) Civil Action No. 2:19-cv-01527-NBF
MINNESOTA LIMITED, LLC,))
Defendant.)

MOTION TO APPROVE AND ENTER CONSENT JUDGMENT

Plaintiff hereby moves this Court to Approve and Enter the Consent Judgment against Defendant Minnesota Limited, as agreed to by the parties. In support thereof, the Secretary represents that the parties have reached an agreement for the purpose of settling the above-referenced matter. The terms of this agreement are set forth in the Consent Judgment attached hereto as Exhibit A, which has been signed by Defendant.

WHEREFORE, for the reasons set forth above, the Secretary respectfully requests that the Court enter the Consent Judgment attached hereto.

Respectfully submitted,

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UNITED STATES DEPARTMENT OF LABOR

Kate S. O'Scannlain Solicitor of Labor

Oscar L. Hampton III Regional Solicitor

/s/ Brian P. Krier Brian P. Krier Senior Trial Attorney PA ID # 313826

CERTIFICATE OF SERVICE

I certify that on November 26, 2019, I electronically filed the foregoing *Motion to*Approve and Enter Consent Judgment with the Clerk of Court by using the CM/ECF system. On this same date, I served a true and correct copy of the foregoing to Defendant's legal counsel by electronic mail:

Patrick V. Johnson, Esquire Speeter & Johnson 1515 Canadian Pacific Plaza 120 South Sixth Street Minneapolis, MN 55402 pjohnson@speeterjohnson.com

> /s/ Brian P. Krier Brian P. Krier Senior Trial Attorney